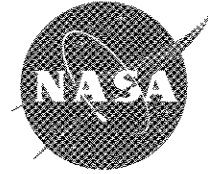


National Aeronautics and Space Administration  
**George C. Marshall Space Flight Center**  
Marshall Space Flight Center, AL 35812



October 5, 2011

Reply to Attn of: LS01 (AMM)

**MEMORANDUM FOR RECORD**

**FROM:** LS01/James R. Frees

**SUBJECT:** Blanket approval for NASA Employees to attend the 23<sup>rd</sup> Annual  
Dr. Wernher von Braun Memorial Dinner

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Several NASA employees have been invited to attend the 23rd Annual Dr. Wernher von Braun Memorial Dinner sponsored by The National Space Club. This event is scheduled for Wednesday, October 26, 2011, at the U.S. Space & Rocket Center Davidson Center for Space Exploration. The evening begins with a reception and cash bar at 5:30 p.m., and dinner at 7:00 p.m. The Guest Speaker is Bob Crippen, pilot for the first space shuttle flight.

The National Space Club (NSC) was founded on October 4, 1957, to stimulate the exchange of ideas and information about rocketry and astronautics, and to promote recognition of U.S. achievements in space. The NSC is a non-profit corporation comprised of representatives from industry, government, educational institutions, and private individuals.

This event will be a widely-attended gathering of NSC members, NASA and military members, and local elected officials, as well as other community leaders. Besides 150 NASA MSFC employees, representatives of the U.S. Army Aviation and Missile Command, the U.S. Army Space and Missile Defense Command, U.S. Armed Forces Strategic Command, and the Missile Defense Agency, have been invited. It is also expected that community leaders, state and local elected officials, and representatives of private industry will be in attendance. The event is valued at \$75.00 per person and approximately 800 are expected to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

I have determined that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. The attendance of NASA employees at the event will help to raise NASA's profile with state and local military, governmental, and community leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its activities. Given the purpose of the event, the broad attendance anticipated, and the reasonable market value of this event, I have determined that the value to the agency in having employees attend this event outweighs any

concern that free attendance may or may appear to improperly influence them in the performance of their duties.

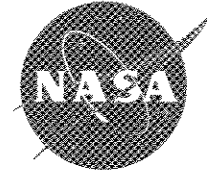
Accordingly, NASA employees that have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect the NSC, or a majority of its members, are not covered in this determination and should seek a specific determination from this office pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in this event.

The National Space Club is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

  
James R. Frees  
Acting Chief Counsel

National Aeronautics and Space Administration  
**George C. Marshall Space Flight Center**  
Marshall Space Flight Center, AL 35812



October 5, 2011

Reply to Attn of:

LS01 (AMM)

**MEMORANDUM FOR RECORD**

**FROM:** LS01/James R. Frees

**SUBJECT:** Approval for NASA Employees with Senior Institutional Responsibilities  
to attend the 23<sup>rd</sup> Annual Dr. Wernher von Braun Memorial Dinner

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Certain NASA employees with senior institutional or project responsibilities have been invited to attend the 23rd Annual Dr. Wernher von Braun Memorial Dinner sponsored by The National Space Club, scheduled for Wednesday, October 26, 2011, at the U.S. Space & Rocket Center Davidson Center for Space Exploration. The evening begins with a reception and cash bar at 5:30 p.m., and dinner at 7:00 p.m. The Guest Speaker is Bob Crippen, pilot for the first space shuttle flight.

The National Space Club (NSC) was founded on October 4, 1957, to stimulate the exchange of ideas and information about rocketry and astronautics, and to promote recognition of U.S. achievements in space. The NSC is a non-profit corporation comprised of representatives from industry, government, educational institutions, and private individuals.

This event will be a widely-attended gathering of NSC members, NASA and military members, and local elected officials, as well as other community leaders. Besides 150 NASA employees, representatives of the U.S. Army Aviation and Missile Command, the U.S. Army Space and Missile Defense Command, U.S. Armed Forces Strategic Command, and the Missile Defense Agency, have been invited. It is also expected that community leaders, state and local officials, and representatives of private industry will be in attendance. The event is valued at \$75.00 per person and approximately 800 people are expected to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

Most of NSC's members are companies that are currently providing contractual services to NASA, or will seek to provide contractual services to NASA in the future.<sup>1</sup> Some NASA personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to members of NSC in their pursuit to provide, or seek to provide, contractual services to NASA.<sup>2</sup> These personnel are similarly situated in that they each have senior institutional responsibilities that could significantly influence current or future contracts for a majority of the NSC's corporate members. Alternatively, they may have duties that could significantly affect the interests of the NSC itself.

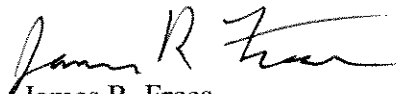
I have determined that free attendance of these senior institutional leaders at the event is in the interests of the agency because it will further agency programs and operations. The attendance of these senior NASA employees at the event will help to raise NASA's profile with state and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the reasonable market value of the event, I have determined that the value to the agency in having these senior institutional leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees in the positions identified above may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

The National Space Club is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

  
James R. Frees  
Acting Chief Counsel

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<sup>1</sup> See file for listing of NSC corporate membership.

<sup>2</sup> Center Director; Deputy Director; Associate Directors; Deputy Director, Office of Procurement; Supervisor, External Relations Office; Lead, Protocol and Events Office; Acting Chief Counsel; Chief Financial Officer; Deputy Chief Financial Officer; Director, Office of Strategic Analysis & Communications.